



By E-MAIL

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Legislative Council Secretariat
3rd Floor, Citibank Tower
3 Garden Road, Central
Hong Kong

Attn: Ms Mandy Poon
Clerk to Panel

To Whom It May Concern:

**Comments from Task Force of Hong Kong Green Purchasing Charter on
A New Producer Responsibility Scheme For
Waste Electrical and Electronic Equipment (WEEE)**

With the sponsorship from the Environment and Conservation Fund and the enthusiastic supports from eleven Founding Members, the Green Council launched the Hong Kong Green Purchasing Charter (www.HKGPC.org) on 4th October 2007. In February 2009, with the support from the advanced Green Purchasing practitioners (particularly the Founding and Fellow members), a Task Force was officially formed which collectively undertake the following major activities:

- input to, and assist in the development and implementation of strategic and voluntary programmes to promote the HKGPC and its green purchasing-related activities;
- prepare and/or share information on latest trends, initiatives and market information on environmentally preferable products and/or services;
- identify and formally recognize outstanding 'green' producers and suppliers; and
- participate regularly and enthusiastically in the Task Force meetings and activities arranged and conducted with the intention of pursuing and accomplishing the three green purchasing promotion activities identified above.

Representing a significant proportion of the purchasing powers in the local public and private sectors, the HKGPC Task Force is pleased to submit the following comments, questions and recommendations on the proposal to introduce a new producer responsibility scheme (PRS) for waste electrical and electronic equipment (WEEE) for the Panel's consideration:

- (I) As of today, the HKGPC has more than 50 members from SMEs and large corporations, representing a remarkable purchasing power in Hong Kong. Under the



WEEE scheme, every enterprise has to reserve a vast amount of money to pay for disposing the used WEEE every year. We generally agree with the PRS scheme but we are eager to know how such 'levy' will be utilized effectively and will not be beneficial to a few parties at the end.

- (II) Resources should be allocated to solve upstream supply chain problems by encouraging the production of environmental products instead of downstream reactions to "raise fund" for removing waste. That is why the manufacturer has the responsibility to produce and market more environmentally preferable (i.e. lower and less harmful waste / reusable / recoverable / recyclable / longer life, etc.) products so that the purchasers can have options to consider and select in the market. Without desirable and competitive greener options, the WEEE problems will persist and the 'levy' collected will sustain the WEEE collection and treatment agents.
- (III) Even the product manufacturers / distributors / agents would bear the cost for WEEE treatment, these suppliers may include the 'levy' into the selling price which means ultimately the cost of 'levy' will only be borne by the purchasers but the principle of sharing out the costs among all parties cannot be applicable. As a result, the collection of the 'levy' has to be studied with consultation with the industries (particular the bulk purchasers).
- (IV) The duration of the consultation process is too short and its coverage is not comprehensive because a number of the logistics and purchasing practitioners are not aware of this. As a result, these professional groups do not have the opportunities to express their comments / suggestions on the proposed WEEE Scheme. Therefore, I propose to extend the consultation period so as to allow those professional groups express their views.

The above summarizes the HKGPC Task Force's position on the proposed WEEE Scheme and related issues. On behalf and as the Chairman of the Task Force, I look forward to having our comments taken into account for the discussion within the upcoming Panel meeting on 29th March 2010.

Yours sincerely,

A handwritten signature in black ink, appearing to read 'Timothy P.W. Lam', is written over a circular stamp or watermark.

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TL/tc

List of HKGPC Task Force Members

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